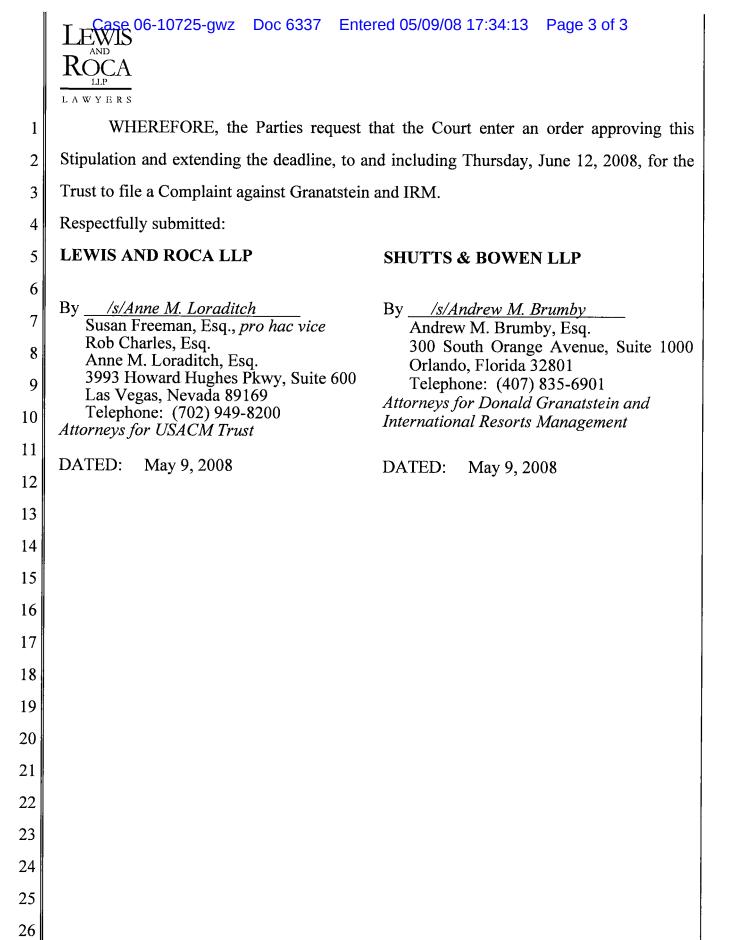
LAWYERS

deadline for the Trust to file a complaint to avoid and recover pre-petition transfers pursuant to 11 U.S.C. §§ 547, 548, and 550 (the "Stipulation") against Granatstein and IRM. In support of this Stipulation, the Parties state as follows:

- 1. The Trust asserts that it has claims against Granatstein and IRM for the avoidance and recovery of preferential and/or fraudulent pre-petition transfers (the "Transfers") received from USA Commercial Mortgage ("USACM") by Granatstein and IRM during the 90-day period preceding the filing of USACM's chapter 11 bankruptcy case on April 13, 2006 (the "Petition Date").
- 2. On February 12, 2008, in pursuit of its avoidance claims, the Trust made demand upon Granatstein and IRM for the return of the Transfers. Counsel for Granatstein and IRM responded to the Trust's demand indicating a further response would be forthcoming upon receipt of additional information from Granatstein and IRM.
- 3. The Trust is continuing its dialogue with Granatstein and IRM regarding the Transfers and the services Granatstein and IRM provided to USACM pre-petition. The current deadline for the Trust to file a complaint to avoid and recover the Transfers, pursuant to 11 U.S.C. §§ 547, 548, and 550 ("Complaint"), is May 12, 2008, pursuant to the Court's Order Approving Stipulation To Extend Deadline To File Complaint To Avoid And Recover Pre-Petition Transfers Pursuant To 11 U.S.C. §§ 547, 548 and 550 [Docket No. 6172] entered April 10, 2008.
- 4. In order to afford the Parties additional time to explore a possible resolution to this matter, the Parties have agreed that a further extension of the deadline for filing a Complaint is warranted.
- 5. The Parties submit that an extension to Thursday, June 12, 2008, of the deadline for filing a Complaint is reasonable and will effectively conserve the Court's valuable resources and serve the efficiencies of this matter by facilitating the exploration of a resolution of the Trust's avoidance claims against Granatstein and IRM.

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